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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

## NORTHERN DISTRICT OF CALIFORNIA

## SAN FRANCISCO DIVISION

UNILOC USA, INC. and  
UNILOC LUXEMBOURG, S.A.,

Plaintiffs,

V.

APPLE INC.,

Defendant.

Case No.: 3:18-cv-00358-WHA

**CIVIL L.R. 79-5(E) DECLARATION OF  
AARON S. JACOBS REGARDING  
DEFENDANT APPLE INC.'S  
ADMINISTRATIVE MOTION TO SEAL  
PORTIONS OF ITS OPPOSITION TO  
UNILOC'S RENEWED MOTION FOR  
ORDER (1) ADDING UNILOC 2017 AS A  
PARTY AND (2) DECLARING THIS  
COURT HAS SUBJECT MATTER  
JURISDICTION AND EXHIBITS C AND  
D THERETO (DKT. NO. 162)**

1 I, Aaron S. Jacobs, hereby declare as follows:

2 1. I am counsel for Plaintiffs Uniloc USA, Inc., and Uniloc Luxembourg, S.A.,  
3 (collectively “Uniloc”).

4 2. On Thursday, October 22, 2020, at Docket Number 162, Defendant Apple Inc.  
5 (“Apple”) filed an administrative motion to seal the **Memorandum** (at 8:20-24) and **Exhibits C** and  
6 **D** accompanying Apple’s opposition to Uniloc’s renewed motion to add Uniloc 2017 LLC as a party  
7 and declare that this Court has subject-matter jurisdiction.

8 3. I reviewed those materials in coordination with counsel for third-party Fortress Credit  
9 Co. LLC and Fortress Investment Group LLC (collectively “Fortress”). In light of this Court’s prior  
10 orders regarding the parties’ efforts to seal certain of this and similar information, Uniloc believes  
11 that the information that Apple proposes to seal or redact associated with Docket No. 162 may be  
12 submitted onto the public record.

13 4. For the foregoing reasons, Uniloc therefore does not ask that the proposed  
14 information be sealed or redacted, and so Apple’s administrative motion to seal Uniloc and  
15 Fortress’s information, Dkt. No. 162, may be denied.

16 Date: October 30, 2020

Respectfully submitted,

17 /s/ Aaron S. Jacobs

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